

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MUHAMMAD SHAHZEB KHAN,
a/k/a "Shahzeb Jadoon,"

Defendant.

INDICTMENT

25 Cr.

25 CRIM

63

COUNT ONE

**(Attempted Provision of Material Support and Resources to a Designated Foreign
Terrorist Organization)**

The Grand Jury charges:

1. From at least in or about November 2023, up to and including in or about September 2024, in Canada, the Southern District of New York, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MUHAMMAD SHAHZEB KHAN, a/k/a "Shahzeb Jadoon," the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally attempted to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of this Indictment, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339(B)(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages

and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B, 3238, and 2.)

COUNT TWO
(Attempted Acts of Terrorism Transcending National Boundaries)

The Grand Jury further charges:

2. From at least in or about November 2023, up to and including in or about September 2024, in Canada, the Southern District of New York, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, did knowingly attempt to kill, kidnap, maim, commit an assault resulting in serious bodily injury, and assault with a dangerous weapon any person in the United States, in violation of the laws of the State of New York and of the United States, that is, New York Penal Law Sections 110, 120.05(1) & (2), and 120.10(1), 125.25(1), and Title 18, United States Code, Sections 2339B and 2, in circumstances involving conduct transcending national boundaries, and in which one or more facilities of interstate and foreign commerce were used in furtherance of the offense, to wit, cellular telephones and the internet.

(Title 18, United States Code, Sections 2332b(a)(1)(A), (a)(2), (b)(1)(A), 3238, and 2).

FORFEITURE ALLEGATIONS

3. As a result of committing the terrorism offenses alleged in Counts One and Two of this Indictment, MUHAMMAD SHAHZEB KHAN, a/k/a “Shahzeb Jadoon,” the defendant, shall forfeit to the United States, (i) pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), any and all assets, foreign and domestic, of the

defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offenses; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offenses; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offenses, including but not limited to a sum of money in United States currency representing the total amount of the defendant's assets, and (ii) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON

MATTHEW PODOLSKY
Acting United States Attorney